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## **VIA FACSIMILE (718) 613-2185**

Honorable Kiyo A. Matsumoto United States District Court Eastern District of New York c/o Clerk of the Court Chambers: Room S905 Courtroom: N6G 225 Cadman Plaza East Brooklyn, New York 11201

Re: Case Name: Innovation Ventures, LLC et al. v Walid Jamil et al., Docket No: 12 Civ. 05354

Dear Judge Matsumoto:

This letter is being submitted to Section 6 of this Court's Stipulation and Order regarding Walid Jamil's "view[] as to what constitutes appropriate monthly living expenses..."

It is imperative to emphasize that there is no judgment against Walid Jamil or any entity he affiliates himself with, and thus any restraint should be limited to conveyance or assignment of any tangible or intangible asset of significant value in order to avoid any future fraudulent transfer of assets. This Court should be cognizant of the fact that Mr. Jamil works for Charter Home Healthcare and has personal and family financial obligations. Consideration should also be given to the fact that Mr. Jamil stipulated to the freezing of his assets without taking up judicial resources to argue his defense.

Mr. Jamil respectfully requests that this Court factor in the costs of this litigation, the fact that he is not a judgment debtor and the fact that he stipulated to the preliminary injunction (subject to the living expense provision). Mr. Jamil respectfully requests a living expense amount of \$10,000 per month (excluding legal fee expenses), subject to modification pursuant to a motion to modify brought by either party.

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Thank you for your consideration of this request.

Very truly yours,

PAESANO/AKKASHIAN, PC

Andhony R. Paesano

cc: All counsel of record (via email)